

EXHIBIT A

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No.	Claim Terms and Affected Asserted Claims	Largan's Proposed Construction and Intrinsic and Extrinsic Evidence
1.	<p>"aspheric"</p> <p>'518 Patent, claim 1 '691 Patent, claim 21 '796 Patent, claims 1, 15, and 21 '378 Patent, claims 1 and 8</p>	<p>Plain and Ordinary Meaning.</p> <p><u>Intrinsic Evidence:</u></p> <p>'518 Patent specification, including but not limited to Abstract, col. 1:43-2:57; 5:16-6:9; 7:26-8:11; 9:42-10:30; 11:49-53; Tables 1-6, Figures 1, 3, 5. '691 Patent specification, including but not limited to Abstract, col. 1:57-2:52; 5:44-67; 7:19-41; 8:43-58; 9:57-10:53; 11:54-12:24; 13:26-61; 14:53-15:22; 16:24-61; 17:62-18:32; 19:16-51; 20:43-21:13; 22:15-51; 23:52-24:21; 25:23-28; 25:43-53; Figures 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11-33. '796 Patent specification, including but not limited to Abstract, col. 1:45-2:67; 5:54-67; 7:24-8:2; 9:5-67; 10:65-12:13; 13:1-20; 14:4-35; 15:19-40; 16:23-53; 17:46-67; 18:36-67; 19:46-67; 20:38-67; 21:46-67; 22:38-67; 23:46-67; 24:38-67; 25:46-67; 26:38-67; 27:46-67; 28:37-67; 29:51-30:45; Tables 1-20, Figures 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A. '378 Patent specification, including but not limited to Abstract; col. 1:43-4:24; 6:46-59; 8:1-39; 9:44-10:30; 11:1-12:16; 12:55-13:12; 14:44-67; 16:40-67; 18:42-67; 20:42-67; 22:42-67; 24:20-35; Tables 1-16; Figures 1, 3, 5, 7, 9, 11, 13, 15.</p> <p>'518 Patent File History (U.S. App. No. 11/539,175). '691 Patent File History (U.S. App. No. 12/912,401). '796 Patent File History (U.S. App. No. 14/105,811). '378 Patent File History (U.S. App. No. 14/094,478).</p> <p><u>Extrinsic Evidence:</u></p> <p>Expert Testimony: Expert testimony of Dr. Rongguang Liang regarding what this term would have meant to one of ordinary skill in the art, in light of the claims, specifications, prosecution, and litigation histories of the Patents-in-Suit. Largan reserves the right to call Dr. Liang to rebut any claim construction that Defendants offer and support through extrinsic evidence.</p>

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		<p>Defendants' Invalidity Contentions for U.S. Patent 7,274,518, served on May 18, 2020. Defendants' Invalidity Contentions for U.S. Patent 8,395,691, served on May 18, 2020. Defendants' Invalidity Contentions for U.S. Patent 8,988,796, served on May 18, 2020. Defendants' Invalidity Contentions for U.S. Patent 9,146,378, served on May 18, 2020.</p> <p><i>Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.</i>, Case No. 3:13-cv-02502, Parties' Joint Claim Construction and Prehearing Statement Pursuant to P.L.R. 4-3 (Dkt. #35) (N.D. Cal. February 4, 2014).</p> <p><i>Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.</i>, Case No. 3:13-cv-02502, Plaintiff Largan Precision Co., Ltd.'s Opening Claim Construction Brief (Dkt. #36) (N.D. Cal. March 21, 2014).</p> <p><i>Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.</i>, Case No. 3:13-cv-02502, Genius Electronic Optical Co., Ltd.'s Responsive Claim Construction Brief (Dkt. #40) (N.D. Cal. April 4, 2014).</p> <p><i>Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.</i>, Case No. 3:13-cv-02502, Plaintiff Largan Precision Co., Ltd.'s Reply Claim Construction Brief (Dkt. #44) (April 11, 2014).</p> <p><i>Largan Precision Co., Ltd. v. Genius Electronic Optical Co., Ltd.</i>, Case No. 3:13-cv-02502, Parties' Final Joint Claim Construction and Prehearing Statement (Dkt. #96) (September 25, 2014).</p> <p><i>Optical System Design</i>, Robert E. Fischer and Biljana Tadic-Galeb (2000), pages 116-127.</p> <p><i>Optical System Design</i>, Second Edition, Robert E. Fischer, Biljana Tadic-Galeb, and Paul R Yoder (2008), pages 115-126, 776.</p> <p><i>Zemax Optical Design Program User's Guide</i>, Version 6.0 (1997).</p> <p><i>Zemax Optical Design Program User's Manual</i> (2011).</p> <p><i>Code V Reference Manual</i> (2006), Chapter 4.</p> <p><i>Code V Reference Manual</i> (2008), Chapter 4.</p> <p><i>Code V Lens System Setup Reference Manual</i> (2012), Chapter 4.</p>

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		<p>U.S. Patent No. 7,933,077, entitled "Wide-Angle Imaging Lens Module."</p> <p>U.S. Patent No. 8,422,151, entitled "Wide Angle Imaging Lens Module."</p> <p>U.S. Patent No. 9,097,860, entitled "Lens Assembly."</p> <p>U.S. Patent No. 9,581,786, entitled "Imaging Lens Assembly."</p>
2.	<p>"lens elements"</p> <p>'518 Patent, claim 1</p> <p>'691 Patent, claim 21</p> <p>'796 Patent, claims 1, 15, and 21</p> <p>'378 Patent, claims 1 and 8</p>	<p>Plain and Ordinary Meaning.</p> <p><u>Intrinsic Evidence:</u></p> <p>'518 Patent specification, including but not limited to Abstract and generally throughout; Tables 1, 3, 5; Figures 1, 3, 5.</p> <p>'691 Patent specification, including but not limited to Abstract and generally throughout; Figures 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11-33.</p> <p>'796 Patent specification, including but not limited to Abstract and generally throughout; Tables 1-20, Figures 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A.</p> <p>'378 Patent specification, including but not limited to Abstract and generally throughout; Tables 1-16; Figures 1, 3, 5, 7, 9, 11, 13, 15.</p> <p>'518 Patent File History (U.S. App. No. 11/539,175).</p> <p>'691 Patent File History (U.S. App. No. 12/912,401).</p> <p>'796 Patent File History (U.S. App. No. 14/105,811).</p> <p>'378 Patent File History (U.S. App. No. 14/094,478).</p> <p><u>Extrinsic Evidence:</u></p> <p>Expert Testimony: Expert testimony of Dr. Rongguang Liang regarding what this term would have meant to one of ordinary skill in the art, in light of the claims, specifications, prosecution, and litigation histories of the Patents-in-Suit. Largan reserves the right to call Dr. Liang to rebut any claim construction that</p>

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3.	<p>“half of the diagonal length of the effective pixel area of the electronic sensor is ImgH”</p> <p>’691 Patent, claim 26 and 27</p>	<p>This claim term is not indefinite.</p> <hr/> <p><u>Intrinsic Evidence:</u></p> <p>’691 Patent specification, including but not limited to col. 1:57-2:36; 5:44-6:8; 6:63-7:8; 7:19-51; 8:33-42; 9:34-56; 11:22-29; 11:36-53; 12:60-67; 13:7-25; 14:30-37; 14:44-52; 15:58-65; 16:5-23; 17:30-37; 17:44-61; 19:1-8; 20:20-27; 20:34-42; 21:49-56; 21:63-22:14; 23:20-27; 23:34-51; 24:58-65; 25:5-22; Figures 1A, 2A, 3A, 4A, 5A, 6A, 7A, 8A, 9A, 10A, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29, 31-33.</p>

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